

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

FILED BY JK D.C.

05 JUL 19 AM 8:36

THOMAS M. GOULD
CLERK, U.S. DISTRICT COURT
W/D OF TN, MEMPHIS

DESIREE L. RAMSEY and
JAMES F. RAMSEY,

Plaintiffs,

v.

FORD MOTOR COMPANY,

Defendant.

No. 04-2511

Breen / Pham

~~PROPOSED~~ THIRD AMENDED SCHEDULING ORDER

The parties having come before this Court to amend the Scheduling Order, and good cause for an extension of the discovery period having been shown, the Scheduling Order is amended as follows:

COMPLETING ALL DISCOVERY: September 19, 2005

(a) DOCUMENT PRODUCTION: September 19, 2005

(b) DEPOSITIONS, INTERROGATORIES, AND REQUESTS FOR
ADMISSIONS: September 19, 2005

(c) EXPERT WITNESS DISCLOSURE (Rule 26):

(1) DISCLOSURE OF PLAINTIFFS' RULE 26 EXPERT
INFORMATION: August 20, 2005

(2) DISCLOSURE OF DEFENDANT'S RULE 26 EXPERT
INFORMATION: September 19, 2005

(3) EXPERT WITNESS DEPOSITIONS:
Plaintiffs' Experts: September 19, 2005
Defendant's Experts: October 18, 2005

FILING DISPOSITIVE MOTIONS: November 18, 2005

OTHER RELEVANT MATTERS:

No depositions may be scheduled to occur after the discovery cutoff date. All motions, requests for admissions, or other filings that require a response must be filed sufficiently in advance of the discovery cutoff date to enable opposing counsel to respond by the time permitted by the Rules prior to that date.

Motions to compel discovery are to be filed and served by the discovery deadline or within 30 days of the default or the service of the response, answer, or objection, which is the subject of the motion, if the default occurs within 30 days of the discovery deadline, unless the time for filing of such motion is extended for good cause shown, or the objection to the default, response, answer or objection shall be waived.

This case is set for a jury trial. The pretrial order date, pretrial conference date, and trial date will be set by the presiding judge. The trial is expected to last 3 to 4 days.

This case is appropriate for ADR. The parties are directed to engage in court-annexed attorney mediation or private mediation after the close of discovery.

The parties are reminded that pursuant to Local Rule 11(a)(1)(A), all motions, except motions pursuant to Fed. R. Civ. P. 12, 56, 59, and 60 shall be accompanied by a proposed order.

The opposing party may file a response to any motion filed in this matter. Neither party may file an additional reply, however, without leave of the court. If a party believes that a reply is necessary, it shall file a motion for leave to file a reply accompanied by a memorandum setting forth the reasons for which a reply is required.

At this time, the parties have not given consideration to whether they wish to consent to trial before the magistrate judge. The parties will file a written consent form with the court should they decide to proceed before the magistrate judge.

This Order has been entered after consultation with trial counsel pursuant to notice. Absent good cause shown, the scheduling dates set by this order will not be modified or extended.

It is so ORDERED this 18 day of July, 2005.


JUDGE

APPROVED FOR ENTRY:

Brian Kelsey Issued by Chad Graddy w/permission

David Wade (TN bar # 4166)

Brian K. Kelsey (TN bar # 22874)

Martin Tate Morrow & Marston, P.C.

International Place, Tower II

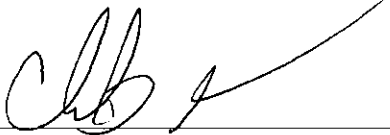
6410 Poplar Avenue, Suite 1000

Memphis, TN 38118-4843

Telephone: (901) 522-9000

Fax: (901) 527-3746

Attorneys for Desiree L. and James F. Ramsey



J. Randolph Bibb, Jr. (TN bar # 09350)

Chad D. Graddy (TN bar # 23196)

Baker, Donelson, Bearman, Caldwell & Berkowitz

165 Madison Avenue, Suite 1900

Memphis, TN 38103

Telephone: 901-526-2000

Fax: (901) 577-2303

Attorneys for Ford Motor Company



Notice of Distribution

This notice confirms a copy of the document docketed as number 18 in case 2:04-CV-02511 was distributed by fax, mail, or direct printing on July 19, 2005 to the parties listed.

David Wade
MARTIN TATE MORROW & MARSTON
6410 Poplar Ave.
Ste. 1000
Memphis, TN 38119

Sandi L. Pack
BAKER DONELSON BEARMAN CALDWELL & BERKOWITZ
Commerce Center
Suite 1000
211 Commerce St.
Nashville, TN 37201

Brian Kirk Kelsey
MARTIN TATE MORROW & MARSTON
6410 Poplar Ave.
Ste. 1000
Memphis, TN 38119

John Randolph Bibb
BAKER DONELSON BEARMAN & CALDWELL
211 Commerce St.
Ste. 1000
Nashville, TN 37201

Jimmy Moore
CIRCUIT COURT, 30TH JUDICIAL DISTRICT
140 Adams Ave.
Rm. 224
Memphis, TN 38103

Honorable J. Breen
US DISTRICT COURT